

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Cr. No. 18-3495 JCH
	)	
<b>DOUGLAS D. SMITH,</b>	)	
	)	
Defendant.	)	

UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE MOTIONS *IN LIMINE* AND  
RESPONSES DEFENDANT'S PRETRIAL DOCS. 48, 49, 50, AND 51

The United States respectfully moves this Court for an extension of time of 14 days to file its motions *in limine* and 14 days to respond Defendant's Motion to Exclude Expert Witness Testimony by Theodore Chavez (Doc. 48), Defendant's Motion to Suppress Evidence (Doc. 49), Defendant's Motion to Dismiss under Rule 12(b) for Insufficient Evidence (Doc. 50), and Motion to Produce Grand Jury Transcripts (Doc. 51). In support thereof, the United States submits the following:

1. The United States' Responses to Defendant's Pretrial Motions (Docs. 48, 49, 50, and 51) are due on April 30, 2020.
2. Additionally, motions *in limine* are due April 27, 2020.
3. Counsel for the United States request additional time to adequately respond to the issues raised by Defendant and is asking for an additional 14 days to file its responses and to file it motions *in limine*.
4. Counsel for Defendant has been contacted and has no objection to an extension of

14 days or until May 11, 2020 to file motions *in limine* and May 14, 2020 to file its responses to Defendant's pretrial motions (Docs. 48, 49, 50 and 51).

5. The United States has not filed any previous motions for an extension of time.

WHEREFORE, the United States requests an additional 14 days to file its *motions in limine* and 14 additional days to respond to Defendant's Motion to Exclude Expert Witness Testimony by Theodore Chavez (Doc. 48), Defendant's Motion to Suppress Evidence (Doc. 49), Defendant's Motion to Dismiss Under Rule 12(b) for Insufficient Evidence (Doc. 50), and Motion to Produce Grand Jury Transcripts (Doc. 51).

Respectfully submitted,

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Filed Electronically on 04/24/20  
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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will cause a copy of this filing to be sent to counsel for Defendant.

/s/\_\_\_\_\_  
NOVALINE D. WILSON  
Assistant United States Attorney